SEAMLESS AND UNIVERSAL NUMBERING

February 2007

Contacts:
Karen Peltz Strauss, Legal Consultant to CSD
kpsconsulting@starpower.net
202-363-1263

Sean Belanger
sbelanger@csdvrs.com
727-421-1031

The Goal: Deaf, hard of hearing and speech disabled persons who rely on Internet communication for their telephone relay needs must have a telephone address that enables them to contact one another and to be contacted, regardless of the relay provider they use, to the same extent that PSTN and VoIP users are able to identify and call one another.

The Problem: Individuals using VRS and Internet text relay (IP relay) services have IP addresses that are constantly changing (are dynamic). This prevents individuals wishing to call Internet-based relay users from knowing their IP addresses at any given point in time.

> **VRS**. Although certain VRS providers use their own unique and proprietary means of linking pseudo numbers to IP addresses, these are not consistent from one provider to the next. As a consequence, each user has multiple ways of being identified and contacted by originating callers. This confusing and complex arrangement discourages and can even make it impossible to return VRS calls. It also makes point-to-point video calls between individuals using different video relay systems very difficult.
>
> **IP relay**. Only one IP relay provider offers its users telephone numbers that are linked to the users' instant messaging service (AIM), allowing incoming calls to be directed to the users' AIM. The vast majority of IP relay providers do not offer the ability to receive incoming relay calls.

The Solution: The Industry Numbering Committee of ATIS is working on solutions that would map telephone numbers under the North American Numbering Plan to individual IP addresses. This would allow providers to interface with LECs to provide global access for incoming PSTN calls. The solution adopted should allow callers to choose their VRS and IP relay providers for incoming and outgoing calls.

Benefits of Universal Numbering

- Would achieve functional equivalency by providing a seamless telephone service: would allow for full integration into society by enabling the receipt of phone calls to Internet-based relay users from employers, teachers, doctors, service people, etc.

- Would allow relay customers to have integrated 911 services that allow for location provisioning, E-911 support, and call backs from public safety answering points. The FCC has already directed interconnected VoIP providers to have customer call back numbers.

- Would help to curb fraudulent and abusive outgoing calls because the assigned numbers would be tied to locations that can facilitate tracking of such callers.

- Would enable relay users to complete written and on-line applications and forms requiring the entry of information about one's telephone numbers.

- Would enable hearing people to identify deaf, hard of hearing, and speech disabled IP-based relay users through telephone directories of telephone numbers.

- Would allow hearing people to choose their own VRS provider for calls to deaf and hard of hearing relay users.

Relevant Pending FCC proceedings:
Numbering: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Declaratory Ruling and Further Notice of Proposed Rulemaking, CG 03-123, FCC 06-57 (May 9, 2006), ¶¶44-50.

Emergency Access: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Access to

Emergency Services, Notice of Proposed Rulemaking, CG 03-123, FCC 05-196 (November 30, 2005)